UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

MAR 14 1990

CERTIFIED MAIL
Return Receipt Requested

Mr. Gary Reynolds
A-1 Plating Company, Inc.
311 S. Haven Street
Baltimore, Maryland 21224

Re: A-1 Plating Company, Inc.
MDD 003 101 847

Dear Mr. Reynolds:

Pursuant to the enforcement authority granted to the Environmental Protection Agency ("EPA") under Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927, which provides in relevant part that "...any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous waste shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator,...furnish information relating to such wastes..." (emphasis added), EPA hereby requests that you furnish to EPA within fifteen (15) calendar days of receipt of this letter, the information requested below.

1. Please furnish to EPA a list of all the waste streams generated by A-1 Plating Company, Inc. ("the Facility") and a copy of all hazardous waste manifests for off-site shipments of hazardous waste since November 8, 1986.

2. Did A-1 Plating Company, Inc. or anyone designated by A-1 Plating Company, Inc. conduct waste analyses on each waste stream generated by the Facility as required under 40 C.F.R. Section 268.7(a)?

3. Did A-1 Plating Company, Inc. or anyone designated by A-1 Plating Company, Inc. use its knowledge of each of the Facility's waste streams to determine if the wastes are restricted from land disposal pursuant to 40 C.F.R. Section 268.7(a)? If so, did A-1 Plating Company, Inc. generate any documentation to support such determination?

4. Please furnish to EPA copies of all waste analyses conducted on each of the Facility's waste streams.

5. Please furnish to EPA copies of all supporting data used to determine, solely on applied knowledge of the waste, whether any of the Facility's waste streams are restricted from land disposal (See 40 C.F.R. Section 268.7(a)(5)).

6. Did A-1 Plating Company, Inc. or anyone designated by A-1 Plating Company, Inc. furnish a certification and/or written notification (the terms of which are described in 40 C.F.R. Section 268.7(a)(1) and (2)) with each shipment of land disposal restricted waste to the treatment, storage, or disposal facility receiving the waste?

7. Please furnish to EPA copies of all certifications and/or written notifications required by 40 C.F.R. Section 268.7(a)(1) and/or (2) to the treatment, storage or disposal facility receiving the Facility's waste.

8. Please furnish to EPA copies of all bills, invoices, receipts and any other records in your possession, custody or control which relate to the disposal or treatment of waste shipped off-site after November 8, 1986.

Failure to provide the information requested or to adequately explain the basis for such failure constitutes a violation of Section 3007(a) of RCRA and may result in enforcement action and the imposition of civil penalties of up to $25,000 per day, and/or criminal fines of up to $50,000 per day and/or up to two years imprisonment, for each day of violation. (See 42 U.S.C. Sections 6928(c), (d), and (g)).

You are entitled to assert a claim of business confidentiality, covering any part of the information, in a manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim is asserted and substantiated at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

This collection of information requested is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. Sections 3501-3520.

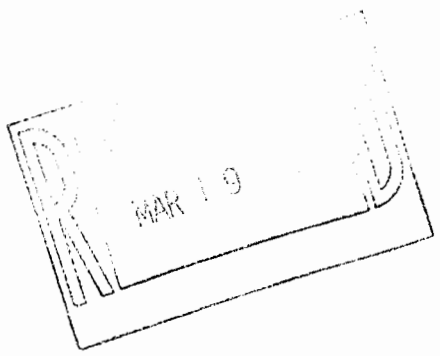
Please send the requested information to:

U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107
Attn: Sheila Briggs (3HW62)

If you have any questions concerning this matter, please contact Ms. Sheila Briggs at (215) 597-0130.

Sincerely,

Robert E. Greaves, Chief
RCRA Enforcement/UST Branch



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

S96

Report of Observations

Type of Inspection/Observations: RCRA Follow-up Date [illegible]

Facility Name: A-1 Plating [illegible]

Remarks: [illegible]

[illegible] MD [illegible]

[illegible]

EPA ID # MD [illegible]

Contact - Mr. Gary [illegible]

A RCRA follow-up of A-1 Plating was made on the above date and the following [illegible] -

/ The above company was [illegible] and [illegible]. The [illegible] company [illegible] complied.

** Immediately [illegible] 3 days [illegible] office [illegible] the [illegible].

/ Mr [illegible] for NCS. [illegible] Mr [illegible] hazardous waste for [illegible] 3 [illegible] the company [illegible] inspection.

/ The above company was [illegible] the [illegible] waste [illegible].

/ At the time of inspection, the hazardous waste container [illegible] quarter full of F006 sludge. [illegible] Mr [illegible]

Observer: [illegible] Person Interviewed: [illegible]

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

FI-

S96

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 89/06/26

Facility Name: A-1 Plating Company, Inc.,

Remarks: 311 S. Haven Street
Baltimore, MD 21224
(301) 327-5552

E.P.A. I.D. # MDD003101347
Contact :- Mr Gary Reynolds

During my RCRA follow-up inspection of the above Company, the following was found :-

/ On 06/09/89, PAB 6084960 (manifest document no) 25 cubic yards of RQ Hazardous Waste Solid NOS ORM-E NA 9189 - Wastewater Treatment sludge from electroplating (F006) were removed by "Delaware Container Co. Inc." to "Enviro Corp. at York in PA".

Discrepancy on the above manifest regarding Maryland Hauler permit number - Section #15 was made by the hauler. The hauler permit # written on manifest as 89A-1426 instead of HWH047. A letter in order to rectify this discrepancy was written by "Delaware Container Co., Inc" to DHMH - Maryland - Hazardous Waste Division.

* Under LDR, generator's restricted waste notification and certification not attached to the manifest.

/ In the Hazardous Waste Storage Container lying were approx. 5 cubic yards of wastewater treatment sludge from electroplating (F006). On the container used for storing Hazardous waste, posted was "Hazardous Substance Hauler Kricker".

Observer: Harpreet K. Singh Person Interviewed:

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State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

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Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 89/06/26

Facility Name: A-1 Plating Company, Inc.

Remarks: In the backyard of the company, lying there the following :-

1 x 55G drum of HNO_3
2 x 55G drums of Ethyl Dicyanide
1 x 55G drum of Sodium Hydroxide Liquid
3 x 55G drums of Sodium Hypochlorite
5 x 55G drums of MEK
4 x 55G drums of Toluene
11 x 55G empty drums
1 x 55G drum of H_2SO_4
1 x 55G drum of Zinc Chloride
4 x 55G drums of Electroless Copper
3 x 55G drums of Sodium Hypochlorite Soln.

As per Mr Reynolds the above drums have raw material in them, which will be used for wastewater treatment.

In addition to the above drums also lying there 3 x 55G drums of oil. 2 out of these 55G drums had used oil. As per Mr. Reynolds this used oil is not company's waste but would be used again. (After metal parts are treated with Black oxide, they are dipped in oil).

1 x 5G container of Muriatic acid (Company raw material) - as per Mr Reynolds.

* Inspection log for hazardous waste container, Contingency Plan & Emergency Procedures, Annual Report for 1988 were not seen by the writer.

As per Mr Reynolds, Mr Weatherstein takes care of the paperwork regarding these.

Observer: Harpreet K Singh Person Interviewed:

MDE 111
REV. 1/11/88

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
~~201 W. PRESTON STREET~~ 2500 Broening Hwy Baltimore
~~BALTIMORE, MARYLAND 21201~~ Dundalk, MD 21224
~~(301) 225-5700~~ (301) 631-3400

SQG

SITE COMPLAINT

NUMBER	DATE
SC-0-89-082	89/03/06

1. Name of violator: A-1 Plating Company, Inc
   Address: 311 E. Haven Street, Baltimore, MD 21224
   County: Baltimore City Phone: (301) 327-5552
2. Violation Type (with reference to the Annotated Code of Maryland)
   - ☐ Water Pollution Control and Abatement (Environment Article, Sections 9-301 through 9-344)
   - ☐ Oil Control (Environment Article, Sections 4-401 through 4-418)
   - ☑ Controlled Hazardous Substances (Environment Article, Sections 7-201 through 7-268)
   - ☐ Landfills and Sludge Disposal (Environment Article, Section 9-210)
   - ☐ Other
3. Specifically: storing electroplating wastewater treatment sludge (F006) for over 90 days without a permit and hence violation of COMAR 26.13.05.05. No Contingency Plan & Emergency Procedures as required per 40 CFR 265.54 & COMAR 26.13.05.04. No inspection log for hazardous waste containers and proper updating of COMAR 26.13.05.04 Records regarding hazardous waste disposal not maintained for last 3 years.
4. You are hereby advised the following corrective actions are necessary. Compliance with the corrective actions contained herein does not preclude the Department from imposing further requirements. In addition, the Department reserves the right to impose sanctions or penalties for the underlying violation(s).
   Immediately remove the electroplating wastewater treatment sludge by a certified hauler to a permitted facility. Develop Contingency Plan & Emergency Procedures. Maintain an inspection log for hazardous waste containers.
5. The above described violation(s) may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties. Continuation of the violation(s) or failure to take the corrective actions described above may result in additional sanctions or penalties.
6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: Mr. Ed Livingston Title: General Manager

Authorized by: Martin W. Walsh, Jr.
Secretary
Department of the Environment

Issued by: Maurice K. Kirk
Inspector

Phone: (301) 631-3400

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State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 89/06/26

Facility Name: A-1 Plating Company Inc

Remarks: hazardous waste. Mr Weatherstein was not available during the time of inspection as Mr Reynolds said that his (Mr Weatherstein's friend, was buried during the weekend and he doesn't know when Mr Weatherstein is expected back in the office.

The writer told Mr Reynolds that all the documents regarding hazardous waste should be always available at the time of inspection.

Observer: Harpreet K. Singh Person Interviewed:

MDE 111
REV. 1/11/88

FI-89-12-11-2C-0041 (1)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 8/13/89

Facility Name: A-1 Plating Company, Inc.

Remarks: 311 S. Haven Street,
Baltimore, MD 21224
(301) 327-5552

EPA I.D. # MDD003101847

Contact:- Mr Ed. Weatherstein (General Manager)

On 8/13/89, a routine RCRA inspection of the above company was conducted and the following was advised to correct in order to comply with the Maryland's Controlled Hazardous Substance Regulations:-

* Remove the electroplating wastewater treatment sludge immediately! This sludge stored for more than 90 days without permit.
* Develop "Contingency Plan and Emergency Procedure" for its personnel to implement at the time of fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters at the facility.
* Develop an inspection-log for hazardous waste storage containers
* Retain copies of Annual Reports, non-site specific manifests for a period of at least 3 years from the date that the waste was sent to off-site treatment, storage or disposal

On the above date, a RCRA follow-up

Observer: Rupert K. Vinay Person Interviewed: Ed Weatherstein

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State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA (Follow-up) Date 8/10/04

Facility Name: A-1 Plating Company, The

Remarks: was conducted and the following was found :-

* Electroplating wastewater treatment sludge, has been removed and is in storage for more than 90 days without a permit.

According to Mr Weatherstein "Delaware Container" will take the electroplating wastewater sludge this afternoon and will prep at Delaware Container overnight and will be shipping to "Envirite" first thing morning. The reason that hazardous waste sludge would be kept at Delaware Container (containing) they not provide service at night time".

* Mr Weatherstein is working on Contingency Plan & Emergency Plan, but no final draft of this Plan has been developed - at yet.

* An inspection log for the hazardous waste container has been developed.

* Mr Weatherstein has obtained "Annual Report form for 1987" from the state office. As per Mr Weatherstein, Annual Report form for 1987 would be supplied by this week & a copy of this form should be sent. Regarding the manifests

Observer: Harpreet K. Singh Person Interviewed: Ed Weatherstein

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 9/13/[illegible]

Facility Name: A-1 Plating Company, Inc.

Remarks: for last 3 years "Mr [illegible]stein said, "~~Delaware~~ New Jersey [illegible]" has been contacted and very soon a copy of manifests would be obtained.

Observer: [illegible] K Singh Person Interviewed: Ed Weathersten

MDE 111
REV. 1/11/88

(L-84-02-16-BC-0041

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 89/03/16
Facility Name: A-1 Plating Co., Inc.
Remarks: 311 S. Haven Street
Baltimore, MD 21224
(301) 327-5552

EPA I.D.# MDD003101847
Contact :- Mr Ed Weatherstein (General Manager)

Since my last inspection of the above company on 89/03/06, the following shipment of hazardous waste was made:-
On 03/06/89, PAB 45 99442, 25 cub. yd. of "Waste-water treatment sludge, from Electroplating, (F006)" were removed by "Delaware / Container" to "Envirite in PA".
NOTE:-(Regarding "LDR" compliance) The generator's notice regarding restricted waste and waste analysis data ~~add~~ available. Copy of the manifest no. PAB 45 99442, generator's restricted waste notice and waste analysis data ~~?~~ attached to the report.

* The above company now has 2 copy of manifests for 1986, 1987, 1988.
* According to Mr Weatherstein, "Contingency Plan and Emergency Procedures would be completed by this Monday i.e. 89/03/20". For draft'd
* "A-1 plating" now has an inspection log for hazardous waste container.

Observer: Harpreet K. Singh Person Interviewed: E.C. Weatherstein Jr.

MDE 111
REV. 1/11/88

SQC

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A-1 PLATING COMPANY, INC. 311 S. HAVEN STREET
A. Site Name B. Street (or other identifier)

BALTIMORE MD 21224 BALT. CITY
C. City D. State E. Zip Code F. County Name

G. Site Operator Information
1. Name A-1 Plating Company, Inc. 2. Telephone Number (301)327-5552
3. Street 311 S. Haven St. 4. City Baltimore 5. State MD 6. Zip Code 21224

H. Site Description

I. Type of Ownership

__1. Federal __2. State __3. County __4. Municipal ✓5. Private

J.

✓1. Generator __2. Transporter __3. Treatment __4. Storage __5. Disposal

K. Regulatory Status

__1. Interim Status __3. Part B Permit Application Submitted

__2. Permitted Facility __4. Part B Permit Application in Preparation

L.
1. Principal Inspector Name HARPREET K. SINGH
2. Title PUBLIC HEALTH ENGINEER
3. Organization STATE OF MARYLAND HAZARDOUS & SOLID WASTE MGMT. ADMINISTRATION ENFORCEMENT
4. Telephone No. (area code and No.) (301)631-3400

M. Inspection Participants

1. MR. ED HEATHERSTEIN	6.
2. MR. GARY REYNOLDS	7.
3. MR. JOHN REISINGER	8.
4.	9.
5.	10.

EXHIBIT 2-3. PRE-INSPECTION WORKSHEET

Date Completed	Description of Activity
89/03/14	Complete and verify the general information section of the inspection report
	Identify and obtain all relevant information:
89/03/03	Manifest history
	Notification form
	Part A permit application
89/03/13	Previous inspection reports
89/03/14	Correspondence
	Part B permit application (if available)
89/03/03	Annual reports
	Other
	Assemble inspection package:
	Notification form
	Part A permit application
89/03/14	Previous inspection reports
89/03/14	Waste generation and characterization information
89/03/03	Information from air and water pollution control agencies or offices
✓	Inspection checklists
✓	Copies of State statutes and regulations or Federal laws and regulations
✓	Safety equipment
✓	Camera and film
✓	Agency identification card
✓	Sampling equipment (if necessary)
	Other
	Scheduling the investigation:
	Letters of intent to visit/inspect
	Establish date(s) of the inspection
	Follow-up telephone call to confirm date(s) of the inspection and request additional information be made available upon inspection
	Complete inspection plan
	Other

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 89/02/13

Facility Name: A-1 Plating Company, Inc.

Remarks: 311 S. Haven Street
Baltimore, MD 21224
(301) 327-5552
EPA ID # MDD003111847

On 85/03/01, Generator CHS inspection conducted by "Mike Braumberg"
Result – No hazardous waste was shipped off-site in five years and all waste stream went to sanitary sewer. In order to take care of ~~[illegible]~~ toxic metals in wastewater, a pre-treatment facility to be installed by 5/19/01. The filter cake from the pre-treatment would be hazardous.
51 drums of waste material were stored in the yard. 35 out of the 51 drums were in rusted, deteriorated condition.
Site complaint no. SC-2-85-351 was issued for CHS and water pollution violations. The violations to be corrected by 06/21/85

85/04/02, Analysis of waste [illegible]. Analysis done by "[illegible]".

On 85/11/21, Routine RCRA inspection conducted by "Art O'Connell"
The drums [illegible] of [illegible] waste sludge being stored didn't have a "Maryland Hazardous Waste Sticker" required for transportation.
The company didn't have "Contingency Plan and Emergency Procedures".

Observer: [illegible] Person Interviewed:

MDE 111
REV. 1/11/88

A-1 Plating

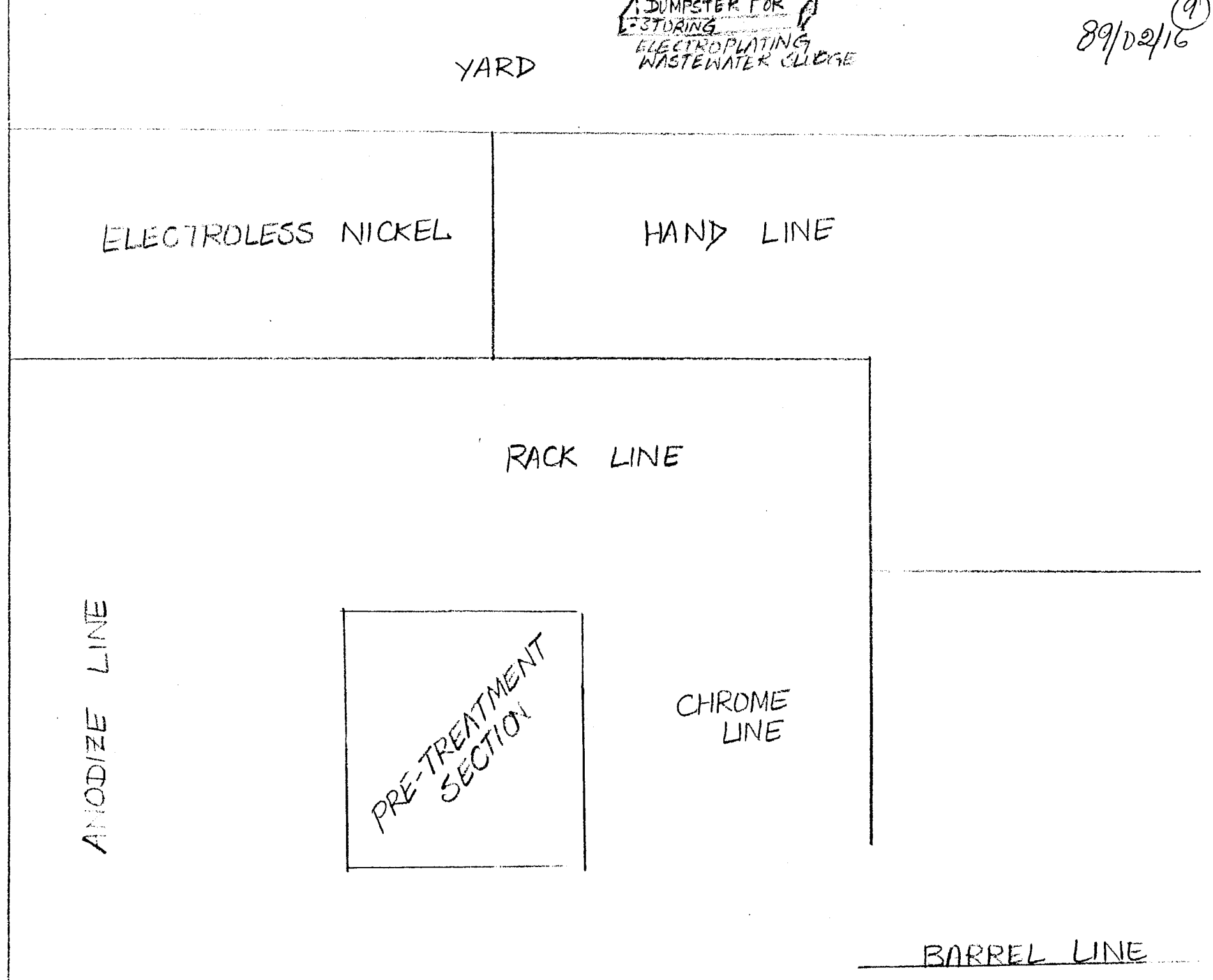
On 86/02/26, RCRA follow-up was conducted by "Art O'Connell".
Problem:- Both the contractor and the generator had problem in finding a facility to accept the waste which has been in storage for almost 90 days.

86/03/07, A copy of "Contingency Plan and Emergency Procedures" sent to State office.

87/12/04, Memo from Mersylin Zaw-Mon to Chuck Lewis regarding:- Transportation of hazardous waste from Prince George Silverplating to A-1 Plating.

Annual reports for 1986 submitted with the hazardous waste division.
1987 annual report not submitted.

A-1 Plating has wastewater discharge permit. The permit number is 4-00745. The pre-treated effluent goes into Baltimore City sanitary sewer.

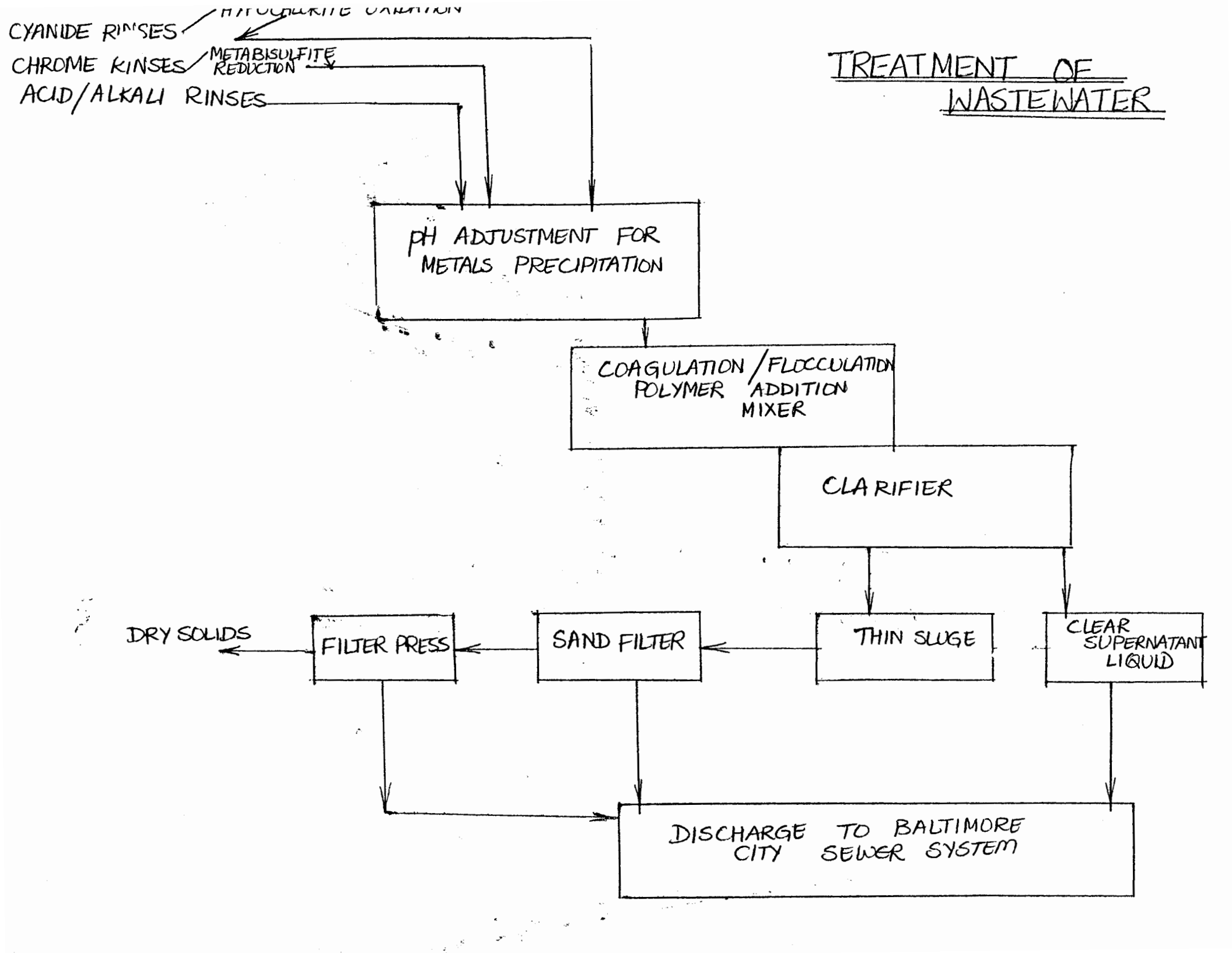


89/02/16 (9)

LAYOUT OF A-1 ELECTROPLATING PLANT

Harbreet K. Singh

TREATMENT OF WASTEWATER



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

YR 89 MO 02 DY 16

TIME 0910

DHS Inspection Form
Generators/TSD Facilities

EPA ID Number MDD031015477

TELEPHONE 301-327-5552

Owner/Operator John Nauman III Facility Name A-1 Plating Company, Inc.

Address 311 E. Howard St., Baltimore MD Zip 21324

Description of Work Activity Metal Finishers

I. Generators

A. Description (10.51.03.01-.03)

1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C.? ____Yes, ✓No.
2) Has the facility obtained an EPA identification number? ✓Yes, ____No.
3) Describe the amount of waste generated. (day, week or month) Variable
4) Under which category is the waste(s)?
____Ignitable ____Reactive ____Corrosive
✓EP Toxic ✓RCRA Listed

B. Manifest (10.51.03.04)

1) Is Maryland manifest system in operation for off-site shipment? ✓Yes, ____No.
2) Is TSD Facility to receive DHS identified by ✓Name, ✓Address, ✓EPA ID Number?
3) Is alternate facility identified? ____Yes, ✓No.
4) Is generator identified by ✓Name, ✓Address, ✓Telephone Number, ✓MD/EPA ID Number?
5) Is each transporter identified by ✓Name, ✓EPA ID Number, ✓Maryland Certification Number?
6) Is waste property described? ✓Yes, ____No.
7) Is shipment date marked? ✓Yes, ____No.
8) Is quantity of waste described by ✓Unit of Weight, ✓Volume? N/A
9) Are containers to be loaded identified by ✓Type, ✓Number?
10) Is proper certification noted and signed by generator? ✓Yes, ____No.
11) Are adequate copies available for operator, transporter and TSD? ____Yes, ____No.

C. Pre-Transport Requirements (10.51.03.05)

1) Is each container marked with date accumulation began? ____Yes, ✓No. If yes, has any waste been stored over 90 days? ____Yes, ____No. How much 55 gal drum
2) Are containers in good condition? ✓Yes, ____No. If no, explain good at time of inspection
3) Are containers properly labeled? ✓Yes, ____No.
4) Does generator have approved emergency contingency plan? ____Yes, ✓No.

D. Recordkeeping and Reporting (10.51.03.06)

1) Does the generator have: copies of all signed manifests from the previous three years? ____Yes, ____No; copies of each Annual Report and Exception Report? ____Yes, ____No.
2) Does the generator retain, for a period of three years, all wastes analyses? ____Yes, ____No.
3) Has the generator filed Exception Reports as required by 10.51.03.06 C? ____Yes, ____No.

II. Treatment, Storage, Disposal (TSD) N/A

A. Site characterization (10.51.05.02)

1) Facility Type

____Thermal Treatment	____Biological Treatment
____Recycling/Recovery	____Land Treatment
____Waste Oil	____Incineration
____Chemical Treatment	____Landfill Operation
____Physical Treatment	____Below Ground Tanks
____Open Pile	____Other ____
____Surface Impoundment	____
____Drums	____
____Above Ground Tank(s)	____

2) Does facility generate DHS? ____Yes, ____No.
3) Does facility have waste analysis plan? ____Yes, ____No. If yes, are the procedures of that plan being followed? ____Yes, ____No.
4) Can facility personnel identify DHS being handled? ____Yes, ____No.
5) Can facility personnel confirm that DHS received equal those on manifest form? ____Yes, ____No.
6) Is there a 24-Hour surveillance system to monitor active portion of facility? ____Yes, ____No.
If No, is there an artificial or natural boundary? ____Yes, ____No. Is there a means to control entry? ____Yes, ____No. Is there a restricted access sign posted? ____Yes, ____No.
7) Does facility have: ____emergency equipment inspection log, ____written schedule for inspections, ____security devices, operating & structural prevention equipment?
8) Have facility personnel completed classroom/on-site training? ✓Yes, ____No.
Are records maintained of: ____Job titles/names of employees ____job descriptions, ____Type/amount of continuing training?
9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? ____Yes, ____No.

B. Preparedness and Prevention (10.51.05.03)

1) Facility has the following equipment? ____Internal communication/alarm system for on-site personnel, ✓device for summoning emergency assistance, ✓adequate fire control equipment, water, & suppression chemicals, ✓list of aforementioned equipment.
2) Does facility have adequate area for emergency movement? ✓Yes, ____No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

1) Does facility have an approved contingency plan for: ✓Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water?
✓Responding emergency units to provide assistance during emergency situations?
✓A list of emergency equipment needed to cope with situation?
2) Are emergency response coordinators listed by name, address, & phone number? ____Yes, ✓No.
3) Is there an evacuation plan if recommended? ✓Yes, ____No.
4) Are emergency coordinators available on twenty-four hour basis? ✓Yes, ____No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05) N/A

Facility has a written operating record which contains the following information:

1) ____description & quantity of DHS received.
2) ____method & date of DHS treatment, storage, or disposal.
3) ____location & quantity at each DHS location in facility.
4) ____detailed records & results of waste analysis & treatability tests performed.
5) ____detailed operating summary reports.
6) ____description of emergency incidents that required implementation of contingency plan.
7) ____records & results of inspections of emergency equipment. TSD systems & hazardous waste areas.
8) Has facility retained, for at least 3 years, copies of all manifests? ____Yes, ____No.

E. Groundwater Monitoring (10.51.05.06)

1) Has facility implemented a groundwater monitoring program? _____Yes, _____No, _____N/A.
2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? _____Yes, _____No.
3) Is this plan set up in accordance with 10.51.05.06 C? _____Yes, _____No.
4) Has groundwater quality assessment program been prepared? _____Yes, _____No.
5) Are proper groundwater sampling and analyses records kept? _____Yes, _____No.
6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? _____Yes, _____No.
7) Do the reports match the facility records? _____Yes, _____No.

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

1) Does the facility have an approved closure plan that meets the financial requirements? _____Yes, _____No.
2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? _____Yes, _____No.
3) Does facility maintain liability insurance? _____Yes, _____No.

G. Container Management (10.51.05.09)

1) Are all containers: (a)_____ in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b)_____ lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c)_____ sealed during storage.
2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? _____Yes, _____No.
3) Is an inspection log maintained? _____Yes, _____No.
4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? _____Yes, _____No.
5) Are incompatible wastes placed in separate containers? _____Yes, _____No.
6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? _____Yes, _____No.

H. Tanks (10.51.05.10)

1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration: _____Yes, _____No.
2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? _____Yes, _____No.
   If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? _____Yes, _____No.
3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? _____Yes, _____No.
4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? _____Yes, _____No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? _____Yes, _____No.
7) Is the level of waste in the tank checked at least once each operating day? _____Yes, _____No.
8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? _____Yes, _____No.
9) Are the results of these inspections recorded in an inspection log or summary? _____Yes _____No.
10) Are ignitable or reactive wastes stored in tanks? _____Yes, _____No. If yes:
    a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
    b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? _____Yes, _____No.
    c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? _____Yes, _____No.

I. Surface Impoundments (10.51.05.11)

1) Is two feet of freeboard maintained in the surface impoundment? _____Yes, _____No.
2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? _____Yes, _____No.
3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? _____Yes, _____No.
4) Is the freeboard level inspected daily? _____Yes, _____No.
5) Is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? _____Yes, _____No.
6) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
7) Are ignitable or reactive wastes stored in a surface impoundment? _____Yes, _____No. If yes:
   a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
   b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? _____Yes, _____No.

J. Waste Pile (10.51.05.12)

1) Is wind dispersal of the pile controlled? _____Yes, _____No, _____Not Needed.
2) Are additions to the pile being analyzed prior to adding them to the pile? _____Yes, _____No.
3) Is hazardous waste leachate or runoff collected? _____Yes, _____No. Is the pile protected from precipitation and run-on? _____Yes, _____No.
4) Are ignitible or reactive wastes protected from materials or conditions that might cause it to ignite or react? _____Yes, _____No, _____N/A.
5) Are incompatible wastes hauled in a manner as to assure separation? _____Yes, _____No, _____N/A.

K. Land Treatment (10.51.05.13)

1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? _____Yes, _____No.
2) Is run-on diverted away from the active portion of the facility? _____Yes, _____No. Is run-off from the active portion of the facility collected? _____Yes, _____No.
3) Has the proper waste analyses been peformed? _____Yes, _____No.
4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? _____Yes, _____No.
5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? _____Yes, _____No.
6) Have the additional requirements for a closure and post-closure plan been addressed? _____Yes, _____No.
7) Are ignitable or reactive wastes immediately incorporated into the soil? _____Yes, _____No.
8) Are incompatible wastes hauled according to 10.51.05.13 I? _____Yes, _____No.

L. Landfills (10.51.05.14)

1) Is run-on diverted away from the facility's active portions? _____Yes, _____No.
2) Is run-off collected from the landfill's active portions? _____Yes, _____No.
3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) _____Yes, _____No.
4) Is the landfill managed so as to control wind dispersal? _____Yes, _____No.

5) Are the following items maintained in the operating record: ______on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? ______contents of each cell and approximate location of each hazardous waste type within the cell?
6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? ______Yes, ______No. If yes: ______is a leachate collection system available to remove leachate?, and ______is the liquid stabilized or treated physically or chemically prior to disposal?
7) Are empty containers crushed flat or shredded before burial in the landfill? ______Yes, ______No.
8) Are containers holding liquid wastes (or waste containing free liquids placed in the landfill? ______Yes, ______No. If yes, describe containers on comments below.
9) Are ignitable or reactive wastes placed in a landfill? ______Yes, ______No. If yes: ______Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? ______Are incompatible wastes segregated in different landfill cells?

M. Incinerator/Thermal Treatment (10.51.05.15 & .16)

1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
   ______heating value of the waste;
   ______halogen content and sulfur in the waste;
   ______concentrations of lead and mercury unless documented data is available which show these elements not to be present?
2) Are instruments related to combustion and emission control monitored at least every 15 minutes? ______Yes, ______No.
3) Is the stack plume observed visually at least hourly for color and opacity? ______Yes, ______No, ______N/A.
4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? ______Yes, ______No.
5) Is all of the above information documented in the facility's operating record? ______Yes, ______No.

N. Chemical, Physical and Biological Treatment (10.51.05.17)

1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? ______Yes, ______No.
2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) ______Yes, ______No.
3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? ______Yes, ______No.
4) Is this information recorded in the facility's operating record? ______Yes, ______No.
5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? ______Yes, ______No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? ______Yes, ______No.
7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? ______Yes, ______No.
8) Are the results of these inspections recorded in an inspection log or summary? ______Yes, ______No.
9) Are ignitable or reactive wastes placed in a treatment process? ______Yes, ______No. If yes:
   ______Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations?
   ______Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
10) Are incompatible wastes kept from being placed in the same treatment process or equipment? ______Yes, ______No.

O. Permit Requirements (10.51.07)

1) Does the facility have a DHS permit for its activity? ______Yes, ______No.
   If no, has the facility submitted an application for a DHS permit? ______Yes, ______No.
2) List any special Permit requirements that are not in full compliance.

Comments: Contact :– Mr. Ed [illegible] [illegible] PCRA [illegible] A-1 P[illegible] [illegible] "A-1 Plating" is located at 311 E. [illegible] Street and [illegible] plating shop to produce a variety of decorative [illegible] metal parts.

Inspector's Name: HARPREET K. SINGH Title: [illegible] ENGINEER

Facility Location: [illegible] BALTIMORE, MD [illegible]

Facility Rep. present during inspection: [illegible] Title: [illegible] Manager

(1)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
~~201 West Preston Street, Baltimore, Maryland 21201~~ , Bldg no. 40
2500 Broening Hwy, Baltimore, MD 21224
Report of Observations

Type of Inspection/Observations: RCRA Date 89/02/16

Facility Name: A-1 Plating

Remarks: These metal finishes include Zinc Plating, Cadmium Plating (to small extent), Silver Plating, Gold Plating, Lead tin Plating, Bright tin plating, Bright Nickel Plating, Electroless Nickel plating, Black Oxide & Black Nickel plating, Chrome Plating (to small extent).

Metal parts typically consists of:—

(1) Alkaline metal cleaning or acidic metal cleaning.
(2) Acidic cleaning
(3) Metal deposition process
(4) A dye or iridescent finish for appearance.

All metal parts are water rinsed between process steps and after the final process step. After the final water rinsing step, the metal parts are dried and thereafter packed.

The water used for rinsing and the makeup of process solutions is supplied by municipal City Water. The amount of water used is approx. 30,000 gallons per day based on operation for about one shift/day (1 shift = 8 hours). According to Mr Weatherston, the shift rate is different as the production rate varies.

The effluent from the plating rooms is divided in two categories, they being:—

(1) Concentrated waste
(2) Dilute waste

(1) Concentrated wastes consist of spent

Observer: Harpreet K. Singh Person Interviewed: E.C. Weatherston Jr.
(301) 631-3400

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(2)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 09/02/16

Facility Name: A-1 Plating

Remarks: process solutions. As per Mr Weatherstein the spent process solns are never dumped as such because it is too expensive. So they are taken to the pre-treatment room, where they are treated along with the dilute wastes.

(2) Dilute wastes are generated because of the rinsing stages between process steps. This rinsing water contains low concentration of metals and is treated in company's pretreatment facility before being discharged to sewer system.

All the water used in rinsing and makeup of process solutions is provided by the municipal system of the City of Baltimore. The above company has wastewater discharge permit by "City of Baltimore". It being 14-00745 (Paper showing this was presented to the writer.

All the wastewater from different plating processes goes to company's pretreatment facility which takes care of problems regarding Chrome, cyanide, acid/alkalinity and heavy metals.

Different wastewater going to the Pre-treatment facility are:-

(1) Cyanide wastewater
(3) Chrome wastewater
(2) Acid/Alkali wastewater
(1) Cyanide wastewater — Some of the plating baths (for example zinc) have

Observer: Harpreet K. Singh Person Interviewed: E.C. Weatherstein Jr.

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(3)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 8/1/02/16

Facility Name: A-1 Plating

Remarks: are cyanide based. The rinsing stages after each of these processes result in the generation of wastewater with low concentration of cyanide.

(2) Chrome wastewater:— is generated because of the rinsing step after chrome plating & chromate treatment.

Cyanide wastewater undergoes alkaline chlorination treatment with sodium hypochlorite (bleach). The pH of this wastewater is brought to 12.0

Chromium wastewaters are treated with reducing agent (metal bisulphite) to reduce hexavalent chromium to less toxic trivalent chromium. The pH of this wastewater is lowered to 2.0.

The effluent from the cyanide and chromium treatment systems combine with acid/alkali wastewater, and then all effluent flows to Neutralization / precipitation system where acid/alkali reagents are added to neutralize the waste stream to an acceptable ~~wastewater~~ pH value and precipitate the dissolved metals. The wastewater now flows to pump down sump for transfer to clarifier from which ~~waste~~ stream goes to sand filter and ~~the sludge goes~~ to filter press by gravity to sewer.

In the clarifier, a polymer is added which separates the effluent in two layers. They being :— (1) sludge

Observer: Harpreet K. Singh Person Interviewed: E. C. Weathersbee Jr.

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State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 8/10/2/16

Facility Name: A-1 Plating

Remarks: and ② liquid (clear). This clear liquid passes through the sand filter and then discharged in the sewer system. The pH of this clear liquid is 10.00 and it is continuously monitored.

The sludge is further dewatered by passing through Filter Press. The thickened sludge after being dewatered in Filter Press is converted to square cakes. These dry cakes are collected in a hopper lying underneath the filter press. When this hopper becomes full with dry filter cakes, it is taken outside the building (South-West side) and the dry filter cakes are transferred in 25 cubic yards of dumpster for storage pending disposal.

A review of the paperwork (manifest) dealing with disposal of hazardous waste revealed the following :—

On 02/25/88, Manif no. PAB 4600761, 20 cu yards of "Wastewater treatment sludge" (D008) was removed by "Delaware Container Co, Inc." to "The New Jersey Zinc Co in PA".

On 06/01/88, Manif no. PMD 014753838, 825 gallons of "Waste silver cyanide" (D011) was removed by "Empro, Inc." to "Chester Environ-mental in MD".

On 08/24/88 Manif no. PAB 2625302, 6 yards of "Electroplating Wastewater Sludge" (D008) were removed by "Delaware Container Co, Inc" to "New Jersey Zinc Co" in PA.

As per Mr Weatherstein no shipment

Observer: Harpreet K. Singh Person Interviewed: E.C. Weatherstein Jr.

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(5)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 89/02/16

Facility Name: A-1 Plating

Remarks: of hazardous waste has been made in 1989.

The above company has some manifests regarding electroplating wastewater sludge disposal for last three years. According to Mr Weatherstein the company doesn't have complete manifests as many of them were burnt when the above company had fire on Nov. 17th, 1988.

The company does not have Annual Reports for last 3 years, no Contingency Plan and Emergency Procedures, inspection log for dumpster containing hazardous waste.

The inspection of the outside yard of the company revealed the following :-

On the South-West side of the yard, lying was a 25 cubic yard dumpster full of electroplating wastewater sludge. This dumpster had (1) "Maryland hazardous waste sticker" on it, (2) "Delaware Container Co. Inc." sticker on it. (3) The dumpster was covered. (4) No signs of deterioration or leakage of dumpster were observed.

On the left side of the dumpster, lying were 3×55G drums with metal parts in them. On the right hand side of the dumpster lying were some wooden pallets and empty bath tanks.

In the loading dock area, ~~the~~ various

Observer: Harpreet K. Singh Person Interviewed: E.C. Weatherstein Jr.

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(6)

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 89/02/16

Facility Name: A-1 Plating

Remarks: drums were lying. They were:-
2 x 55G drums of Toluene
2 x 55G drums of MEK
4 x 55G drums of Electroless Copper
1 x 55G drum of metal anodes
1 x 55G drum of motor oil
3 x 55G drums of Trichloroethylene
1 x 55G drum of sulphuric acid
1 x 55G drum of bleach

According to Mr Weatherstin the above are unusable chemicals.

The above company needs to correct the following in order to comply with Maryland's CHS Regulations:-

** Contact the certified hauler or permitted facility and get a copy of manifest regarding electroplating wastewater sludge disposal. The paper-work should be kept complete on-site for last 3 years.

** Develop a contingency plan and Emergency Procedures for its personnel to implement emergency procedures to fire, explosions and unplanned releases to air, soil and water. Send a copy of this plan to the HSWMA office for approval.

** Develop and implement a log for hazardous waste dumpster docking for any leaks and deterioration.

Write a letter to state Office stating the reason for not following

Observer: Harpreet K. Singh Person Interviewed: E. C. Weatherstin Jr.

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State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 3/10/88

Facility Name: A-1 Plating

Remarks: The Annual Report for 1987

** Immediately dispose of the hazardous waste by a certified trucker to permitted facility. The precipitating wastewater sludge now stored in storage for more than 90 days.

According to Mr Weatherstein the wastewater sludge would be disposed off at "Emsite" facility for treatment within 2 weeks.

All the above violations should be corrected within 2 weeks i.e till 2nd March, 1989.

An outline of "Contingency Plan and Emergency Procedures" was handed to Mr Weatherstein.

Mr Weatherstein requested a copy of "CHS Regulations & Land Ban Restrictions". For this Mr Emily Troyer phone no. 631-3344 was given.

Observer: Harpreet K. Singh Person Interviewed: C.C. Weatherstein Jr.

MDE 111
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FL-89-03-1L-BC-0041

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA (follow-up) Date 89/03/16

Facility Name: A-1 Plating Co., Inc.

Remarks: 311 S. Haven Street
Baltimore, MD 21224
(301) 327-5552

EPA I.D.# MDD0031018 47
Contact :- Mr Ed Weathersten (General Manager)

Since my last inspection of the above company on 89/03/06, the following shipment of hazardous waste was made — On 03/06/89, PAB 4599448, 25 cu.yd. of "Waste water treatment sludge from electroplating (F006)" were removed by "Delaware Container" to Envirite [illegible] PA".
NOTE:- (Regarding "LDR" compliance) The generator's notice regarding restricted waste and waste analysis data are available. Copy of the manifest no. PAB 4599448, generator's restricted waste notice and waste analysis data is attached to the report

* The above company has the manifests for 1986, 1987, 1988.
* According to Mr Weathersten, "Contingency Plan and Emergency Procedures" would be completed by this Monday i.e. 89/03/20".
* "A-1 plating" now has an inspection log for hazardous waste container.

Observer: Harpreet K Singh Person Interviewed: E.C. Weathersten Jr.

111
1/11/88

Handler Name: A-1 Printing Comp
ID Number: MDD003101847
Inspector: Harbeet K. Singh
Date: 89/02/09

Comments

APPENDIX A-1

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	✓No
trichloroethylene	___Yes	✓No
methylene chloride	___Yes	✓No
1,1,1-trichloroethane	___Yes	✓No
carbon tetrachloride	___Yes	✓No
chlorinated fluorocarbons	___Yes	✓No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	✓No
trichloroethylene	___Yes	✓No
methylene chloride	___Yes	✓No
1,1,1-trichloroethane	___Yes	✓No
chlorobenzene	___Yes	✓No
trichlorofluoromethane	___Yes	✓No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	✓No
ortho-dichlorobenzene	___Yes	✓No
1,1,2-trichloroethane	___Yes	✓No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated sovlents) as as result of being used in the process either inpure form or commercial grade?

xylene	___Yes	✓No
acetone	___Yes	✓No
ethyl acetate	___Yes	✓No
ethyl ether	___Yes	✓No
methyl isobutyl ketone	___Yes	✓No
n-butyl alcohol	___Yes	✓No
cyclohexane	___Yes	✓No
methanol	___Yes	✓No

If the F003 vastestream has been mixed with a solid vaste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

Inspector: Harpreet K. Singh
Date: 89/02/09

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	✓No
nitrobenzene	___Yes	✓No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	___Yes	✓No
methyl ethyl ketone	___Yes	✓No
carbon disulfide	___Yes	✓No
isobutanol	___Yes	✓No
pyridine	___Yes	✓No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers? ___Yes ✓No

If the answer is yes, list the constituents.

_____

_____

(b) Degreasing/cleaning? ___Yes ✓No

If the answer is yes, list the constituents.

_____

_____

(c) Diluents? ___Yes ✓No

If the answer is yes, list the constituents.

_____

_____

ID Number: MDD003101847
Inspector: Harpreet K. Singh
Date: 89/06/09

Comments

(d) Extractants? ___Yes ✓No

If the answer is yes, list the constituents.

(e) Fabric scouring? ___Yes ✓No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? ___Yes ✓No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. ___Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

   If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

   5% methylene chloride
   2% trichloroethylene
   25% 1,1,1-trichloroethane
   68% mineral spirits
   100%

   If the wastestream is a mixture containing a total of 10% or more by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

ID Number: MDD003101847
Inspector: Parkpreet K. Singh
Date: 89/02/09

~~Comments~~

With respect to the F003 solvent wastes, if, before use, the vastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

33% acetone
16% methanol
51% ethyl ether
100%

If in light of the above, the handler appears to be generating F001-F005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

Inspector: HARPREET K. SINGH
Address: 2500 BROENING HWY
BALTIMORE, MD 21224
Telephone No: (301) 631-3400

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name: A-1 PLATING COMPANY, INC
B. Street (or other identifier): 311 S. HAVEN STREET
C. City: BALTIMORE
D. State: MD
E. Zip Code: 21224
F. County Name: BALT. CITY
G. Nature of Business; Identification of Operations: SIC Code(s): METAL FINISHING
H. EPA ID #: MDD003101847
I. Handler Contact (Name and Phone Number): MR. ED WEATHERSTEIN JR. (GENERAL MANAGER), (301)327-555

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following vastes?

(i) F001, F002, F004, or F005 ___Yes ✓No

(ii) F003 ___Yes ✓No

If an F003 vastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Reports ✓ other (specify) ✓

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent vastes, if such vastes were not identified by the facility previously. If you are concerned that F-solvent vastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identfying potentially

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: N/A

2. Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ___Yes ✓No
(ii) F028 ___Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

a. Does the facility handle any of the following vastes?

(i) D002 ___Yes ✓No
(ii) D004 - D011 ___Yes ✓No

The hazardous waste code for electroplating wastewater pretreatment sludge written as D006 in one of the manifests. The hazardous waste code should be F006 instead of D006. (F006)-Electroplating wastewater pretreatment sludge.

b. Does the generator handle any hazardous vastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ___Yes ✓No

[California vaste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U vastes subject to the "soft hammer" that may qualify as California vastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by vaste code. ___Yes ✓No

d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]?

___Yes ✓No*

e. Has the generator conducted any testing of these hazardous vastes to determine whether the concentrations qualify the hazardous vastes as California vastes? ___Yes ✓No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous vaste is not a California vaste?

___Yes ✓No

*/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) Inspection

4. First Third Waste Identification

a. Does the generator handle any of the vastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:
YES
F006

b. Does the generator handle any soft-hammer vastes (Appendices D-1, D-2, and F)? If so, list those vastes:
NO

c. Are any of the soft-hammered vastes California vastes (see Appendix G)? ___Yes ___No N/A

If yes, the vastes must meet BDAT standards prior to disposal.

d. Has the Regional Administrator received demonstrations/certifications for all soft hammered vastes to be land disposed [§268.8(a)(2)]? ___Yes ___No* N/A

e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) Inspection

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted vastes with different treatment standards for constituents of concern? ___Yes ✓No

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ___Yes ___No*

*/ A potential violation is indicated

Handler Name: ~~HARPREET K~~ A-1PLATI
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

3. F Solvents - -

   a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?
   ___Yes ___No* N/A

4. California Wastes

   a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?
   ___Yes ___No* N/A

5. First Third Wastes

   a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
   ___Yes ___No* N/A

   b. Does the facility handle K061 wastes?
   ___Yes ✓No

   If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?
   ___Yes ___No*

   c. Does the facility handle K101 or K102 wastes?
   ___Yes ✓No

   If yes, were nonwastewaters appropriately classified in either the high or lov arsenic subcategories [§268.7(a)] [§268.41(a)]?
   ___Yes ___No*

   d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
   ___Yes ✓No

*/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

C. Waste Analysis - -

✓ 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of vastes ___Yes ✓No Generator is not aware of §268.7(a).

(i) List wastes for which "applied knowledge" was used:
Electroplating wastewater treatment Is sludge.

b. TCLP ___Yes ___No

(i) List wastes for which "TCLP" was used:
N/A

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any vastes handled by the generator subject to waste extract standards not tested using the TCLP? ___Yes ___No N/A

If yes, list: _____

c. Total waste analysis ___Yes ✓No [A-1 Plating had fire on Nov. 17th, 1988, & all the documents regarding waste analysis were burnt.]

d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of vaste composition/generation for applied knowledge) _____

✓/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 8/02/17

Comments

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
___Yes ___No* N/A

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]? (Not known because waste analysis was not available

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
___Yes* ✓No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
___Yes ✓No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
___Yes ___No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]: No. Shipment of F006 waste was not made after 08/08/

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding treatment standard?
___Yes ___No*

(iii) Manifest number? ___Yes ___No*

(iv) Waste analysis, if available?
___Yes ___No

*/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDDDD3101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

Identify offsite treatment facilities N/A

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including: N/A

(i) EPA hazardous waste I.D. number? ___Yes ___No*

(ii) Corresponding treatment standard? ___Yes ___No*

(iii) Manifest number ___Yes ___No*

(iii) Certification regarding waste and that it meets treatment standards? ___Yes ___No*

Identify land disposal facilities receiving the BDAT certified wastes _____

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]: N/A

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding Treatment Standards? ___Yes ___No*

(iii) All applicable prohibitions? ___Yes ___No*

(iv) The manifest number? ___Yes ___No*

(v) The date the wastes are subject to prohibitions? ___Yes ___No*

(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ___Yes ___No*

*/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/12/17

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

N/A

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

N/A

d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

N/A

The EPA Hazardous Waste Number? ___Yes ___No*

Applicable prohibitions? ___Yes ___No*

The manifest number? ___Yes ___No*

Waste analysis data, where available? ___Yes ___No

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ___Yes ✓No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ___Yes ___No*

No shipment of hazardous waste was made after 89/11/17

(iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)] ___Yes ___No*

*/ A potential violation is indicated

Handler Name: A-1 PLATING
ID Number: MDD003101847
Inspector: HARPREET K. SINGH
Date: 89/02/17

Comments

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]?
___Yes ___No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ✓Yes ___No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?
___Yes ✓No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓Yes ___No

If yes, list type of treatment unit and processes
Wastewater Treatment unit

If yes, TSDF checklist must be completed.

*/ **A potential violation is indicated**

ENVIRITE

RCRA LAND DISPOSAL RESTRICTION NOTIFICATION

Generator Name: A-1 PLATING CO. INC EPA ID Number: MDD003101847
Manifest Number: PAD 4599442 Date of Shipment: 3/7/89
EPA Hazardous Waste Number: F006

This notification is hereby submitted to Envirite Corporation in compliance with EPA regulations described in 40 CFR Part 268 which prohibit the land disposal of certain hazardous wastes, unless those wastes are treated to meet specified standards.

CHECK THE APPROPRIATE BLANK

✓ I am the initial generator of the untreated hazardous waste described on the above manifest. This waste must be treated in order to meet the appropriate treatment standards set forth in 40 CFR 268, Subpart D.

____ The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D and/or the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

____ The waste identified above is subject to a case-by-case extension under 40 CFR 268.5 or a national variance under 40 CFR Subpart C.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature E. C. Wattenstein Jr Title General Manager

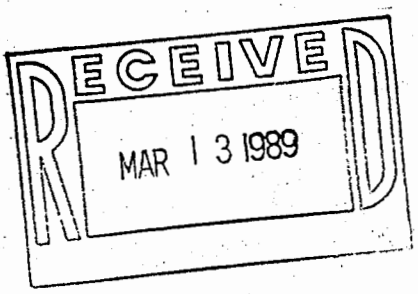
ENVIRITE CORPORATION 1600 Pennsylvania Avenue York, PA 17404
Phone: (717) 846-1900

TICKET 319

ENVIRITE CORP.
1600 PENNSYLVANIA AVE
YORK CITY INDUSTRIAL PARK
YORK, PA. 17404
PHONE 717 846 1900

DATE	TIME
03/07/89	10:06

GROSS WEIGHT M	81060	LBS
TARE WEIGHT	51120	LBS
NET WEIGHT	29940	LBS
TRUCK ID #	270327	



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

ER-SWM-51:REV. 10/86 Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. D·D·0·0·3·1·0·1·8·4·7 Manifest Document No. 22605

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law but is required by State law.

Generator's Name and Mailing Address A-1 PLATING CO. 311 S HAVEN ST BALTO. MD 21224

A. State Manifest Document Number PAB 4599442

B. State Gen. ID SAME

4. Generator's Phone (301) 2275552

5. Transporter 1 Company Name: DELAWARE CONTAINER CO. INC. — 6. US EPA ID Number: P·A·D·0·6·4·3·7·5·4·7·0

C. State Trans. ID HWH-047-89A — PA-AH — 0·0·3·2 — 1430

7. Transporter 2 Company Name: DELAWARE CONTAINER CO. INC — 8. US EPA ID Number: P·A·D·0·6·4·3·7·5·4·7·0

D. Transporter's Phone (215) 393-6600

E. State Trans. ID PA-AH

9. Designated Facility Name and Site Address: ENVIRITE CORP. 1600 PENNSYLVANIA AVE. YORK PA 17404 — 10. US EPA ID Number: P·A·D·0·1·0·1·5·4·0·4·5

F. Transporter's Phone ( )

G. State Facility's ID Not Required

H. Facility's Phone (717) 846-1900

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTEWATER TREATMENT SLUDGE FROM ELECTRO PLATING HAZARDOUS WASTE SOLID NOS ORM-E NA9189 RQ (F006)	1	CY	00025	Y	~~D006~~ F006
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)

	Haz. Code	Physical State		Haz. Code	Physical State
a.	T	S	c.		
b.			d.		

K. Handling Codes for Wastes Listed Above: a. ~~503~~ D81 — c. — b. — d.

15. Special Handling Instructions and Additional Information: MD veh # 89A-1430 MD Dpt # 1581 DRIVER CERT 3684

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
ED WEATHERSTEIN	Ed Weatherstein	03	06	89

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
William R DeVine	William R DeVine	03	06	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Dick Silman	Dick Silman	03	07	89

19. Discrepancy Indication Space APPROX. 2 T REFUSED - FROZEN IN CONTAINER 29940 #/ ENVIRITE SCALE

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
JAN L HAL				

PAB 4599442

EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete

COPY 3 – TSD FACILITY: MAIL TO GENERATOR

ENVIRITE CORPORATION
TECHNOLOGY FOR THE ENVIRONMENT

March 6, 1989

Mr. Ed Weatherstein
A-1 PLATING CO., INC.
311 S. Haven Street
Baltimore, MD 21224

Dear Mr. Weatherstein:

The following are the analyses requested on a sample of Wastewater Treatment Sludge (YS# 0327):

	EP Toxicity Leachate (mg/L)	Maximum Allowable Concentration (mg/L)
Arsenic	≤.88	5.0
Barium	≤.68	100.0
Cadmium	.78	1.0
Chromium (Total)	1.4	5.0
Lead	≤.2	5.0
Mercury	≤.0003	.2
Selenium	≤.14	1.0
Silver	≤.04	5.0
Copper	1.5	---
Nickel	20	---
Zinc	6.2	---

EP Toxicity Analyses were performed per SW 846-1310.

1600 PENNSYLVANIA AVENUE YORK, PENNSYLVANIA 17404 PHONE: (717) 846-1900

	Total Sample - Acid Digest (mg/kg)
Arsenic	≤8.8
Barium	300
Cadmium	1,800
Chromium (Total)	5,600
Copper	760
Iron	30,000
Lead	210
Mercury	≤.0030
Nickel	2,000
Selenium	≤1.4
Silver	9.1
Zinc	46,000

Total Metal Analyses were performed per SW 846-3010.

	Sample As Is	
pH	9.0	
Cyanide (Total)	23.0	mg/kg
Cyanide (Amenable)	3.0	mg/kg
TOC	120	mg/kg

Organic Analyses

Methylene Chloride	.046	mg/kg
Trichloroethylene	≤.001	mg/kg
Tetrachloroethylene	≤.001	mg/kg
Methyl Ethyl Ketone	.03	mg/kg
Anthracene	.44	mg/kg
Phenol	≤.02	mg/kg
1,2 - diphenyl hydrazine n - Nitrosodiphenyl amine	≤.01	mg/kg

Please call if we can be of further assistance.

Sincerely,

ENVIRITE CORPORATION

Judith C. Sayko

Judith C. Sayko
Assistant Operations Manager

JCS/dlt

NONHAZARDOUS CERTIFICATION

This is to certify that Wastewater Treatment Sludge *waste received* 3-6-89 *from* A-1 Plating, Baltimore, MD *on manifest #* PAB 4599442 *has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting petition granted by the U.S. EPA November 6, 1986, and the State of* Penna. *on* Nov. 5, 1981.

Having changed this hazardous waste into a nonhazardous material, Envirite Corporation has eliminated all A-1 Plating's *future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).*

Geoffrey Stengel, Jr.
President

Operations Manager

ENVIRITE

Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462

A - 1 Plating Company, Inc.

METAL FINISHERS

311 S. HAVEN STREET BALTIMORE, MD. 21224 301 - 327-5552

March 3, 1989

Maryland Department Of The Environment
2500 Broening Highway
Baltimore, Maryland 21224

Attn: Harpreet K. Singh

Dear Ms. Singh:

This letter is in response to my phone call to you on Wednesday, March 1, 1989, regarding our sludge pickup problem.

I have contacted Jeff Urey with Envirite in PA., and he informed me that he was waiting for a Module 1 approved from the State of PA.

I called Mr. Tony Kar with the State of PA. (717-657-4588), he informed me that to process a Module I is normally 30 days, but he would try to push it thru in a few days. As soon as Mr. Kar contacts Mr. Urey, the sludge will be picked up and processed for delisting.

Thank you,
A-1 Plating Co., Inc.

Ed Weatherstein

Ed Weatherstein,
General Manager

EW/ldk

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

In Item

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER: F MDD 003101847 3 (T/A, C)

APPROVED

DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

A1 PLATING COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 311 S. HAVEN ST.

CITY OR TOWN: BALTIMORE MARYLAND | ST.: MD | ZIP CODE: 21224

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 311 S HAVEN ST.

CITY OR TOWN: BALTIMORE | ST.: MD | ZIP CODE: 21224

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: NAUMANN AUGUST JR VICE PRES

PHONE NO. *(area code & no.)*: 301-327-5552

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

12/71

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY		
S		T/A C
W		1

SMALL QUANTITY GENERATOR

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1 2 3 4 5 6 7 8 9 10 11 12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 50 51 52 53 54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	August J. Naumann, Jr. Vice-President	8-18-80

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Inspection Date 3/26/86

Facility Name: A-1 Plating Co.

Remarks: Since my last inspection on December 21, 1985, the company has generated one full receptacle of sludge from the company's treatment system. Mr. Neumann stated that he is trying to have the material removed by Delaware Container. However, both the contractor and the generator have had trouble finding a facility to accept the waste which has been in storage for almost 90 days.

Though A-1 still be a generator due to the quantity of waste produced, no waste has been shipped to date. Consequently I advised Mr. Neumann that he will have to complete the required contingency plan and record of personnel training as required. Mr. Neumann said he will have Mr. Dalton the environmental manager complete the documents and send them to this office for approval.

Should any problems concerning the disposal of the waste continue please contact me at 225-[illegible]

Observer: [illegible] Person Interviewed: [illegible]

DHMH 3879

303 = 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection: MDD# 003101847 A-1 Plating **DATE:** 1/23/8

FROM: Dana J. Barnett, Compliance Officer
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME. NFA

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

YR MO DY

TIME

DHS Inspection Form
Generators/TSD Facilities

EPA ID Number

TELEPHONE

Owner/Operator _____ Facility Name _____

Address _____ Zip _____

Description of Work Activity _____

I. Generators

A. Description (10.51.03.01-.03)

1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C.? _____Yes, _____No.
2) Has the facility obtained an EPA identification number? _____Yes, _____No.
3) Describe the amount of waste generated. (day, week or month) _____
4) Under which category is the waste(s)?
_____Ignitable _____Reactive _____Corrosive
_____EP Toxic _____RCRA Listed

B. Manifest (10.51.03.04)

1) Is Maryland manifest system in operation for off-site shipment? _____Yes, _____No.
2) Is TSD Facility to receive DHS identified by _____Name, _____Address, _____EPA ID Number?
3) Is alternate facility identified? _____Yes, _____No.
4) Is generator identified by _____Name, _____Address, _____Telephone Number, _____MD/EPA ID Number?
5) Is each transporter identified by _____Name, _____EPA ID Number, _____Maryland Certification Number?
6) Is waste property described? _____Yes, _____No.
7) Is shipment date marked? _____Yes, _____No.
8) Is quantity of waste described by _____Unit of Weight, _____Volume?
9) Are containers to be loaded identified by _____Type, _____Number?
10) Is proper certification noted and signed by generator? _____Yes, _____No.
11) Are adequate copies available for operator, transporter and TSD? _____Yes, _____No.

C. Pre-Transport Requirements (10.51.03.05)

1) Is each container marked with date accumulation began? _____Yes, _____No. If yes, has any waste been stored over 90 days? _____Yes, _____No. How much _____
2) Are containers in good condition? _____Yes, _____No. If no, explain _____
3) Are containers properly labeled? _____Yes, _____No.
4) Does generator have approved emergency contingency plan? _____Yes, _____No.

D. Recordkeeping and Reporting (10.51.03.06)

1) Does the generator have: copies of all signed manifests from the previous three years? _____Yes, _____No; copies of each Annual Report and Exception Report? _____Yes, _____No.
2) Does the generator retain, for a period of three years, all wastes analyses? _____Yes, _____No.
3) Has the generator filed Exception Reports as required by 10.51.03.06 C? _____Yes, _____No.

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

1) Facility Type
_____Thermal Treatment _____Biological Treatment
_____Recycling/Recovery _____Land Treatment
_____Waste Oil _____Incineration
_____Chemical Treatment _____Landfill Operation
_____Physical Treatment _____Below Ground Tanks
_____Open Pile _____Other _____
_____Surface Impoundment _____
_____Drums _____
_____Above Ground Tank(s) _____
2) Does facility generate DHS? _____Yes, _____No.
3) Does facility have waste analysis plan? _____Yes, _____No. If yes, are the procedures of that plan being followed? _____Yes, _____No.
4) Can facility personnel identify DHS being handled? _____Yes, _____No.
5) Can facility personnel confirm that DHS received equal those on manifest form? _____Yes, _____No.
6) Is there a 24-Hour surveillance system to monitor active portion of facility? _____Yes, _____No. If No, is there an artificial or natural boundary? _____Yes, _____No. Is there a means to control entry? _____Yes, _____No. Is there a restricted access sign posted? _____Yes, _____No.
7) Does facility have: _____emergency equipment inspection log, _____written schedule for inspections, _____security devices, operating & structural prevention equipment?
8) Have facility personnel completed classroom/on-site training? _____Yes, _____No.
Are records maintained of: _____Job titles/names of employees _____job descriptions, _____Type/amount of continuing training?
9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? _____Yes, _____No.

B. Preparedness and Prevention (10.51.05.03)

1) Facility has the following equipment? _____Internal communication/alarm system for on-site personnel, _____device for summoning emergency assistance, _____adequate fire control equipment, water, & suppression chemicals, _____list of aforementioned equipment.
2) Does facility have adequate area for emergency movement? _____Yes, _____No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

1) Does facility have an approved contingency plan for:
_____Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water?
_____Responding emergency units to provide assistance during emergency situations?
_____A list of emergency equipment needed to cope with situation?
2) Are emergency response coordinators listed by name, address, & phone number? _____Yes, _____No.
3) Is there an evacuation plan if recommended? _____Yes, _____No.
4) Are emergency coordinators available on twenty-four hour basis? _____Yes, _____No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

1) _____description & quantity of DHS received.
2) _____method & date of DHS treatment, storage, or disposal.
3) _____location & quantity at each DHS location in facility.
4) _____detailed records & results of waste analysis & treatability tests performed.
5) _____detailed operating summary reports.
6) _____description of emergency incidents that required implementation of contingency plan.
7) _____records & results of inspections of emergency equipment. TSD systems & hazardous waste areas.
8) Has facility retained, for at least 3 years, copies of all manifests? _____Yes, _____No.